

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

ELLEN CHEPIGA, JACKIE EISENBERG,  
DEBRA HALL, ROBERT BEDELL,  
MILCAH HINES, and SUSAN GOODMAN

on behalf of themselves and all others  
similarly situated,

Plaintiffs,

vs.

CONAIR CORPORATION,

Defendant.

No. 3:17-cv-01090-BRM-LHG

**PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF THE  
PROPOSED SETTLEMENT AND CERTIFICATION OF A SETTLEMENT CLASS**

Representative Plaintiffs Ellen Chepiga, Jackie Eisenberg, Debra Hall, Robert Bedell, Milcah Hines, and Susan Goodman (the “Representative Plaintiffs”), having reached an agreement in principle with Defendant Conair Corporation (“Conair”) to settle the above-captioned action, respectfully move this Court to enter the proposed Preliminary Approval Order preliminarily approving the proposed settlement, certifying the settlement class, approving class notice, and scheduling the final approval hearing.

In support of this unopposed motion (the “Motion”), the Representative Plaintiffs submit the following documents:

1. Representative Plaintiffs’ Memorandum of Law in support of this Motion, attached hereto as Exhibit A;

2. the Declaration of John Radice, attached hereto as Exhibit B, including as attachments therewith Representative Plaintiffs’ Settlement Agreement with Conair and the proposed form of notice; and

3. the proposed Preliminary Approval Order, attached hereto as Exhibit C.

Respectfully submitted this 31st day of July 2017.

Dated: July 31, 2017

/s/ John D. Radice

John D. Radice

April D. Lambert (*pro hac vice* forthcoming)

Daniel Rubenstein (*pro hac vice* forthcoming)

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*On behalf of Plaintiffs Ellen Chepiga, Jackie Eisenberg, Debra Hall, Robert Bedell, Milcah Hines, and Susan Goodman.*

**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing document with the Clerk of the Court using CM/ECF.

/s/ John D. Radice

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Dated: July 31, 2017